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Friends of the Cheat (FOC) is a watershed group working to restore, preserve, and promote the outstanding natural qualities of the Cheat River watershed since 1994. FOC has significant concern regarding the proposed Freedomworks Project.

Public Safety

The project proposes a massive impoundment in a remote mountain valley upstream from the community of St. George, and the area's only medical clinic. In the event of a catastrophic failure, the entire eastern side of the valley would be cut off from main roads and emergency services. Thorough geotechnical and engineering studies considering all risk factors that could lead to a dam failure should be conducted. For example, a portion of the project area contains Mauch Chunk soils which are highly erodible and very poor for slope stability. The appropriate agencies and public should be engaged in these studies and the applicant should bear full cost. Research could also quantify financial losses caused by a dam failure to property, businesses, public infrastructure, etc. The area's residents have personal experiences with catastrophic flooding and they should be engaged at every level.

Acid Mine Drainage

The location of the upper reservoir on an abandoned mine land that has had documented AMD and stability issues. Flooding this area could result in toxic AMD pollution. Excavation would likely expose additional acid-producing rock which could result in AMD. Freedomworks would be responsible for any AMD produced as a result of this project. Treating AMD is expensive and labor intensive, which reduces the viability of this project from a financial perspective. AMD from this area is highly corrosive and harmful to equipment and infrastructure, increasing maintenance costs. Freedomworks should have a better understanding of the area's mining history and seek to avoid these areas, or, have geotechnical and water quality studies completed and the development of a restoration plan from a qualified reclamation specialist.

Irreversible Damage to High Quality Streams

This project would cause irreversible damage to high quality streams including Mill Run, Slip Hill Mill Run, Left Branch, and Tub Run. The Mill Run watershed hosts a Brook trout fishery and is listed as a Tier 3 Stream by the WVDEP. Waters given a Tier 3 status are described as "outstanding national resource waters. These include waters in Federal Wilderness Areas, specifically designated federal waters, and high quality waters or natural reproducing trout streams." Brook trout are the only trout native to WV and require high water quality habitat often provided by Tier 3 streams. Brook trout have been extirpated from many streams across WV and the Eastern US due to habitat loss and degradation, such as in the lower Cheat watershed, which has been heavily impacted by legacy coal mining. The Monongahela National Forest and its partners have invested vast resources in restoring Eastern Brook Trout habitat, which will prove important as the effects of climate change increase over the coming years. The lack of any funds proposed for fisheries and hydrologic alteration studies for this project as well as the disregard

of the status of Mill Run as a brook trout fishery and Tier 3 stream reveals the ill-planning put forth for this project.

Rare, Threatened, and Endangered Species

The project area is within habitat range of RTE species, including the Cheat Mountain Salamander, Northern Flying Squirrel, Northern Long-eared Bat, Indiana Bat, and Virginia Big-eared Bat. Already in significant decline due to White-nosed syndrome, the primary threat to survival of these species is the degradation of high-elevation forests. This project involves significant tree clearing and changes to hydrology that could devastate populations. In addition, the project area may include Big Run Bog National Natural Landmark, an area with a rare Pleistocene high-altitude northern sphagnum red-spruce bog and high number of rare plants and animals.

Climate Change Considerations

It is projected that these high elevation habitats will be critical to the resiliency of rare habitats, plant communities, and RTE species as the climate changes. Therefore, the protection of such areas is of the utmost importance. Analysis of climate change models shows that the Cheat watershed will experience more frequent, stronger, and more intense precipitation events. Therefore, engineering of the entire project footprint should consider higher flows and stronger storms for the safety of downstream communities and preservation of natural resources.

Impacts to Cultural Resources

The project proposes to destroy Mill Run, a significant stream in the early settlement of the St. George area. St. George was a hot spot for Native American activity, so at minimum, archeological studies and historic inventories should be conducted.

Viewshed, Negative Impact on Tourism, Public Perception

The proposed pump hydro facility and associated infrastructure (power lines, roads, etc.) and light and noise pollution would drastically change the character of its otherwise remote, wild surroundings. A GIS viewshed analysis reveals that the facility will be visible from many vantage points including Lindy Point (one of WV's most recognized landscapes) and, to FOC's surprise, also at locations in the river valley. The implementation of this project is counter to the community's goal of protecting its public lands, supporting and growing the outdoor recreation economy, and, further, it would have a negative impact on the public's perception of "Wild & Wonderful", "Almost Heaven" WV. The popularity of FOC's Cheat River Water Trail continues to grow, with visitors flocking to Parsons nearly every suitable weekend and over 250 paddlers from all over the country participating in our annual Meet the Cheat float from Holly Meadows to St. George.

The waters of the Cheat River watershed are best left wild and free.

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